Appellate Division of the Supreme Court of the State of New York First Judicial Bepartment

I, Suzanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

MICHAEL ROTHSCHILD RHODES

Counsellor at Law in all the courts of the State of New York on September 21, 2015, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of this court on

March 15, 2015

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Clerk of the Court